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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MANUMALO TUINAMALA, an individual,
Plaintiff,

vs.

LUCKY TOP INC., a foreign corporation,
d/b/a HEY DUDE SHOES,
Defendant.

Case No.: 2:24-cv-01783-CDS-BNW

~~PROPOSED~~ STIPULATION AND
ORDER TO ALLOW DEFENDANT'S
COMPANY REPRESENTATIVE TO
PARTICIPATE REMOTELY IN THE
EARLY NEUTRAL EVALUATION

Plaintiff Manumalo Tuinamala ("Plaintiff") and Defendant Hey Dude, Inc.¹ ("Defendant") by and through their respective attorneys of record, hereby submit this proposed Stipulation and Order to allow a Defendant's company representative to participate remotely in the Early Neutral Evaluation ("ENE") set for May 28, 2025.

Recent staffing changes have affected Defendant's ability to send a company representative to participate at the May 28, 2025, ENE in-person. The Parties have agreed, and request the Court's permission for Daniel Hewitt, Vice President, Corporate Counsel, Crocs, who recently assumed responsibility for this matter, to participate in the May 28, 2025, ENE remotely. Mr. Hewitt has binding authority to settle this matter, and will be present for the duration of the ENE session. He is familiar with the facts and circumstances of this matter, the claims alleged by Plaintiff and the

¹ Defendant Hey Dude, Inc. was incorrectly identified as "Lucky Top Inc. d/b/a Hey Dude Shoes" in the Complaint.

procedural posture of this case. His remote participation via videoconference will not inhibit or limit the parties' ability to negotiate or reach a potential settlement.

Defendant is confident in its ability to fully and in good faith participate in the ENE with Mr. Hewitt participating by videoconference. The attorney of record for this case will be present in-person for the duration of the ENE session. Based on the foregoing, Defendant respectfully requests that the Court's in-person attendance requirement for its representative with settlement authority be waived and that the Court approve Defendant's request to allow Mr. Hewitt to attend the May 28, 2025 ENE virtually.

DATED this 5th day of May, 2025.

DATED this 5th day of May, 2025.

HATFIELD & ASSOCIATES, LTD.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,
P.C.

/s/ Trevor J. Hatfield

/s/ Kathryn C. Newman

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ORDER

IT IS HEREBY ORDERED that the Stipulation to Participate Remotely in the Early Neutral Evaluation (ECF No. 20) is GRANTED; provided, however, that counsel for Defendant must bring to the ENE a computer with the necessary programming or application to allow counsel to connect by zoom or other video conference platform with Defendant's company representative for the entirety of the ENE. Failure to do so will be a violation of this Court's Order and may result in sanctions.


UNITED STATES MAGISTRATE JUDGE

Date: May 6, 2025